

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

August 29, 1985

U.S. Nuclear Regulatory Commission
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

85 SEP 4 P 3:01

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNIT 2 - RESPONSE TO VIOLATIONS 391/85-36-01 -
FAILURE TO FOLLOW PROCEDURE FOR CONTROL OF CONSTRUCTION LOADS AND
391/85-36-04 - FAILURE TO ACCOMPLISH ADEQUATE PROTECTION AND HOUSEKEEPING
IN CABLE TRAYS

This is in response to R. D. Walker's letter dated August 2, 1985,
report numbers 50-390/85-45, 50-391/85-36 concerning
activities at the Watts Bar Nuclear Plant which appeared to have been in
violation of NRC regulations. Enclosed is our response to the citations.

If you have any questions concerning this matter, please get in touch with
R. H. Shell at FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer
J. A. Domer, Chief
Nuclear Licensing Branch

Enclosure

cc: Mr. James Taylor, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

8509130201 850829
PDR ADDCK 05000391
G PDR

TE01

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 2
RESPONSE TO SEVERITY LEVEL V VIOLATION
391/85-36-01
FAILURE TO FOLLOW PROCEDURE FOR CONTROL OF CONSTRUCTION LOADS

Violation 391/85-36-01

10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the PSAR, requires that activities affecting quality be accomplished in accordance with documented procedures. Attachment A, "Construction Loading Guidelines" of TVA procedure Watts Bar Nuclear Plant (WBN) Quality Control Instruction (QCI) 1.07, revision 11, "Work Release," allows up to 400 pounds of live load due to construction personnel on cable trays and heating, ventilating, and air-conditioning (HVAC) duct greater than 12- by 12-inch cross-section and requires that the duct or tray be covered with plywood when live loads are applied.

Contrary to the above, on June 18, 1985, activities were not accomplished in accordance with documented procedures, in that construction craftsmen were observed working on top of seismic I HVAC duct between S&T lines near el 747 in the reactor building without covering the duct with plywood.

This is a severity level V violation (supplement II).

TVA's Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

The violation is a result of failure to follow procedure WBN QCI-1.07, revision 11, "Work Release," in that an electrical craftsperson was standing on a seismic category I HVAC duct without covering the duct with plywood as required by attachment B of this procedure.

3. Corrective Steps Taken and Results Achieved

There was no evidence of damage to the duct. Disciplinary action and additional training were administered to the craft worker involved in this violation.

WATTS BAR NUCLEAR PLANT UNIT 2
RESPONSE TO SEVERITY LEVEL IV VIOLATION
391/85-36-04
FAILURE TO ACCOMPLISH ADEQUATE PROTECTION
AND HOUSEKEEPING IN CABLE TRAYS

Violation 391/85-36-04

10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the PSAR, requires that activities affecting quality be accomplished in accordance with documented procedures. ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants," and Watts Bar Nuclear Plant (WBN) Quality Control Procedure (QCP) 1.36, revision 6, "Storage and Housekeeping," were identified as the applicable procedures for housekeeping. ANSI N45.2.3, paragraph 3.3, and Watts Bar Nuclear Plant WBN QCP 1.36, paragraph 7.2.2.4, require that permanent installed equipment be protected to prevent damage from construction activities. Paragraph 7.2.2.4 specifically requires protection from welding arcs by barriers, screens, shields, or other means as necessary.

Contrary to the above, on June 20, 1985, activities were not accomplished in accordance with documented procedures in that a considerable amount of debris and miscellaneous scrap materials were observed abandoned on top of installed unprotected cable in trays. Welding sparks and slag were also observed falling on top of unprotected cable in trays due to omission of protective coverings.

This is a severity level IV violation (supplement II).

TVA's Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

This violation is a result of a failure to follow procedure WBN QCP-1.36, revision 6, "Storage and Housekeeping," as debris and miscellaneous scrap material were observed in cable trays at elevation 718. This is attributed to an apparent failure to adequately train employees in this procedure. Welding sparks and slag were also observed falling on top of class 1E cables from work being performed on a higher elevation. This was an oversight, as the sparks and slag had fallen to a lower elevation than anticipated.